

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

XIAFEN “SHERRY” CHEN	:	Case No. 1:19-CV-00045
Plaintiff,	:	
vs.	:	District Judge Timothy S. Black
	:	
UNITED STATES OF AMERICA	:	
Defendant.	:	

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO REPLY TO
DEFENDANT’S RESPONSE IN OPPOSITION TO PLAINTIFF’S MOTION TO
AMEND**

Plaintiff Xiafen “Sherry” Chen respectfully moves pursuant to Federal Rule of Civil Procedure 6(b) for a 14-day extension, to and including November 12, 2019, to reply to Defendant the United States of America’s Response in Opposition to Plaintiff’s Motion to Amend (“Opposition Motion”).

On October 15, 2019, Defendant filed a Response in Opposition to Plaintiff’s Motion to Amend her complaint. (ECF No. 28). Plaintiff’s deadline to reply to Defendant’s Opposition Motion is October 29, 2019. *See* S.D. Ohio Civ. R. 7.2(a)(2) (“Any reply memorandum shall be filed within fourteen days after the date of service of the memorandum in opposition.”)

Defendant’s Opposition Motion is 72 pages and alleges multiple grounds as to why Plaintiff’s Motion to Amend should be denied and involves complex state and federal law. A 14-day extension will not prejudice the United States because no other deadlines have been set in this matter and no discovery has occurred.

Counsel for Plaintiff has discussed the extension requested herein with counsel for Defendant United States of America. Counsel for Defendant advised that Defendant does consent to the requested extension.

Date: October 16, 2019

Respectfully submitted,

s/ Michele L. Young
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CERTIFICATE OF SERVICE

I certify that a true copy of the foregoing was filed electronically on October 16, 2019 using the Court's CM/ECF system, which will serve notice of this filing on all counsel of record.

s/ Michele L. Young
Attorney for Plaintiff